

### **REMARKS**

The foregoing amendments and following remarks are submitted to address the issues raised in the Office Action mailed March 15, 2006. Claims 1-13, 15-28, and 30-34 are currently pending in the application. Claims 1-3, 6-13, 16, 19-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over WO 00/43131 by Kucera et al. ("Kucera") in view of U.S. Patent No. 4,766,844 by Brewer et al. ("Brewer"). Claims 4, 5, 15, 22-28, 30-31, and 34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over WO 00/43131 by Kucera et al. ("Kucera") in view of U.S. Patent No. 4,766,844 by Brewer et al. ("Brewer") and further in view of U.S. Patent No. 4,657,788 by Benton et al. ("Benton").

Applicant respectfully requests consideration of the application in view of the foregoing amendments and the following remarks.

#### **Claims 1-3, 6-13, 16, 19-21 – 35 U.S.C. § 103(a)**

The rejection of claims 1-3, 6-13, 16, and 19-21 under 35 U.S.C. § 103(a) as being unpatentable over WO 00/43131 by Kucera et al. ("Kucera") in view of U.S. Patent No. 4,766,844 by Brewer et al. ("Brewer") is believed to be rendered moot by the foregoing amendments.

Applicants respectfully disagree and have amended the claims to distinguish the invention from the applied references. For example, all of the independent claims have been amended to state that the wet substrate after removal from the autodepositing composition is articulated through a through an arcing, rotating, or pivoting motion to provide a uniform coating thickness. That is, as set forth in the specification, at least in paragraph [0031]. None of the references, either singularly or collectively, teach or suggest this aspect.

The basic Kucera et al. reference relates to coating substrates but fails to teach or suggest any substrate after removal from an autodepositing composition which is subjected to articulation while it is wet. Rather, Kucera et al. relates to coating a substrate by dipping. The independent claims, as amended above, require

the articulation motion to be through an arching, rotating, or pivoting action. None of these movements are suggested or contemplated by Kucera.

Brewer fails to correct the deficiencies of Kucera as a reference. Brewer merely relates to tinting metal leads by initial immersion in a flux, and subsequent immersion in molten metal. Upon removal thereof, the flux or solder rapidly solidifies with an imparted drip line. While Brewer does suggest rotation of the part 90 or 180 degrees (col. 2, lines 50-60), this rotation is performed to expose the opposite side of the array to the flux or solder, not to provide a uniform coating thickness as required by the claims of the present invention. As for the material deposited on the array, whether solder or flux, it dries almost instantaneously upon removal from the bath, and therefore Brewer cannot be said to address the same problem as the present invention, namely the elimination of drip lines on a wet article.

It is respectfully submitted that the Kucera and Brewer references do not teach any motivation for combining as they must. In a nutshell, Brewer does not teach articulation of a wet composition and cannot inasmuch as the metal rapidly dries after removal from the molten vat. Kucera also lacks any teaching of articulating a wet coated substrate. Moreover, there is no teaching or suggestion of providing a substantially uniform coating.

**Claims 4, 5, 15, 22-28, 30-31, and 34 – 35 U.S.C. § 103(a)**

The rejection of claims 4, 5, 15, 22-28, 30-31, and 34 under 35 U.S.C. § 103(a) as being unpatentable over WO 00/43131 by Kucera et al. ("Kucera") in view of U.S. Patent No. 4,766,844 by Brewer et al. ("Brewer") and further in view of U.S. Patent No. 4,657,788 by Benton et al. ("Benton") is belived to be rendered moot by the foregoing amendments. Applicants respectfully assert that the foregoing amendmets render each and every independnat claim allowable with respect to Kucera and Brewer, and as such all claims dependant thereon are also in condition for allowance.

In view of the above amendments and arguments, a formal notice of allowance is earnestly solicited.

**Conclusion**

Applicants respectfully requests early consideration of the present application, entry of all amendments herein requested, and allowance of all pending claims.

The Examiner is respectfully invited to contact Todd W. Galinski at (919) 468-5979 ex6204, to discuss any matter relating to this application.

Respectfully submitted,  
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